

30th May 2020



Mr Chris Davies
Manger Future Energy Systems
Australian Energy Market Operator
chris.davies@aemo.com.au

Dear Chris,

AEMO Renewable Integration Study

Ergon Energy Corporation Limited (Ergon Energy) and Energex Limited (Energex) welcome the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on its Renewable Integration Study (RIS).

We note the work undertaken by AEMO in the development of the RIS and recognise that there are a range of emerging technical challenges to be identified and overcome as the penetration of renewable energy increases and we push towards a low-carbon grid.

In Queensland Ergon Energy and Energex have successfully integrated 1.4 GW of utility-scale renewable generation greater than 5MW, with a further 2.6 GW capacity in various stages of the application and connection process. In addition to utility scale renewable generation, Ergon Energy and Energex have facilitated the incorporation of over 3GW of Distributed Photovoltaic (DPV) or Distributed Energy Resources into the distribution networks. Queensland has also been a leader in the development and introduction of DER product and connection standards and through its Demand Management programs has over 900MW of load under control.

With the increasing decentralisation of the energy supply chain it is critical that documents like the Integrated System Plan (ISP) and the RIS consider both Distribution Network Service Provider (DNSP) and supply side solutions to help address these challenges. We believe that there is a range of additional DNSP solutions not currently considered in the RIS that could be implemented in Queensland, to help address some of the identified issues. We look forward to exploring these with AEMO in the next iterations of the RIS work plan.

We would also like to reinforce the potential impact that the operation of DER can have on customers and local distribution network performance. Any consideration of changes to DER operation requires close consideration by the local network, who retain the responsibility for these connection arrangements and the local network operation and performance outcomes.

Our recent submission to the AER for the 2020-2025 period, provides an overview of both our Future Grid Roadmap and our proposed investment to underpin our forecast levels of renewables. This strategy and investment program continues to evolve post submission, in line with changes in technology and customer expectations. At this stage the funding sought by Ergon Energy and Energex as DNSP's is limited to addressing specific issues in the Distribution networks but there may be opportunities for these solutions to provide broader benefit or have an increased scope if they are able to offset system security challenges.

We have a number of internal staff currently working in this area who we can make available to support with subsequent work on the RIS. Our key contact will be Glenn Springall, Manager Network Connections, who leads our work in integrating renewable generation into the Ergon Energy and Energex Networks. Glenn can make other specific staff available as required.

Given the current documents do not seek specific feedback we would like to setup a further discussion on next steps with you and your team as convenient.

Should you require additional information or wish to discuss any aspect of this submission, please do not hesitate to contact myself or Glenn Springall 0419 946 621 or glenn.springall@energyq.com.au).

Yours Sincerely

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